

IN THE UNITED STATES DISTRICT COURT FOR WESTERN DISTRICT OF
PENNSYLVANIA

WILLIAM BARRACLOUGH and FANG
YAN,

Plaintiffs,

Docket No.: 2:23-cv-654

JURY TRIAL DEMANDED

vs.

ANIMAL FRIENDS, INC. et al.,

Defendants.

MOTION TO WITHDRAW APPEARANCE

And now, comes Robert J. Grimm, Esquire and the law firm of Walsh Barnes, P.C. and files the following Motion to Withdraw their appearance on behalf of the Defendants, Animal Friends, Inc., Justin Galvin and Krista Koontz asserting and setting forth the following:

1. The Plaintiffs, William Barraclough and Fang Yan initiated the within Civil Rights Complaint on or about April 21, 2023.
2. Pursuant to the liability insurance policy issued by Cincinnati Insurance Company to the Defendants, Robert J. Grimm, Esquire and the law firm of Walsh Barnes, P.C. entered an appearance on behalf of the Defendants on May 8, 2023.
3. Subsequent to the Entry of Appearance, Cincinnati Insurance Company learned that the Defendants had primary liability insurance with Travelers Insurance Company.
4. On or about April 18, 2023, Cynthia O'Donnell, Esquire, Sunshine R. Fellows, Esquire and Paul Shane Miller, Esquired entered their appearance on behalf of the Defendants.

5. As indicated above, it is believed that the Travelers Liability Insurance Policy is the primary insurance policy for the Defendants and therefore, Robert J. Grimm, Esquire and the law firm of Walsh Barnes, P.C. request to withdraw their appearance.

6. The Defendants' responsive pleading to the Plaintiffs' Complaint is due on or before June 26, 2023.

7. No discovery has taken place and there will be no prejudice to any of the parties by the withdraw of the appearance by Robert J. Grimm, Esquire and the law firm of Walsh Barnes, P.C.

WHEREFORE, Robert J. Grimm, Esquire and the law firm of Walsh Barnes, P.C. requests this Honorable Court to enter the attached Order allowing them to withdraw their appearance on behalf of the Defendants.

Respectfully submitted,

WALSH BARNES, P.C.

By:



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ORDER OF COURT

And now, this _____ day of _____, 2023, upon consideration of the Motion to Withdraw Appearance, it is hereby ORDERED and DECREED that the same is GRANTED. The appearance of Robert J. Grimm, Esquire and Walsh Barnes, P.C. on behalf of all Defendants is hereby withdrawn.

J.

CERTIFICATE OF SERVICE

I, Robert J. Grimm, Esquire, hereby certify that true and correct copies of the foregoing Motion to Withdraw Appearance has been served this 5th day of June _____, 2023 by ECF Filing, to:

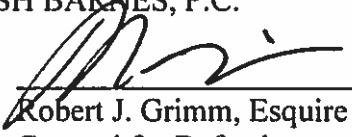
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Respectfully submitted,

WALSH BARNES, P.C.

By:



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Counsel for Defendants,
Animal Friends, Inc.